

“EXHIBIT B”

**From:** [Alejandro Monguia](#)  
**To:** [David Klehm](#)  
**Cc:** [Dilnia Jabari](#); [Trenton Packer](#); [Christina Ramirez](#); [Kayla Peña-Pham](#); [Marcel Sincich](#); [dalekgalipo@yahoo.com](mailto:dalekgalipo@yahoo.com)  
**Subject:** Solis v. State of California  
**Date:** Tuesday, September 3, 2024 15:01:02  
**Attachments:** [2024.09.03 - P Proposed Joint Agreed Upon Jury Instructions \[DRAFT\].doc](#)  
[2024.09.03 - P Proposed Verdict Form \[DRAFT\].doc](#)  
[2024.09.03 - P Proposed Verdict Form \(Punitive Amount\) \[DRAFT\].doc](#)  
[2024.09.03 - Objections to Exhibits re. Joint Exhibit List \[DRAFT\].doc](#)  
[2024.09.03 - Plaintiff's Witness List \[DRAFT\].docx](#)

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Good afternoon Mr. Klehm,

Please find attached the pretrial documents in the *Solis* matter as discussed during the parties' LR 16-2 meeting.

LR 16-2 meeting summary:

- **Joint Jury Instructions:** plaintiff's proposed instructions attached here; defendants' objections to instructions should be served on or about 9/10 with any additional instructions (redlined if altered); the parties should meet and confer regarding instructions on or about 9/17; agreed upon and disputed instructions are filed on 9/24.
- **Joint Verdict Form:** same as with instructions.
- **Witness Lists:** plaintiff's draft list with direct exam times so that defendants can provide the time estimate for cross by 9/9, attached here; witness lists are filed on 9/10 – please send your witness list with direct exam times with sufficient time for plaintiff to provide our cross times.
- **Joint Exhibit List:** plaintiff's draft exhibit list with bates numbers for identification attached here; defendants' objections to exhibits and any additional defense exhibits (also with bates nos) should be served on or about 9/6 so that plaintiff can make objections if necessary; joint exhibit list is filed on 9/10.
- **Defendants' MILs:** plaintiff's counsel is available to confer further anytime today and if the parties require further discussion beyond that, will make themselves available between 9/4 and 9/6.
  - 1) Plaintiff does not plan to admit gruesome photographs. However, photographs of the scene are permissible, screenshots from videos are permissible, and photographs of plaintiff in the hospital showing his injuries are permissible. The photographs plaintiff plans to introduce at this time are listed on plaintiff's attached exhibit list. Plaintiff does not believe any of these photographs are gruesome such that they should be excluded. Please let us know which of those photographs, if any, are subject to your motion. Thus, plaintiff believes this motion is unnecessary, but if filed, plaintiff will oppose.
  - 2) Plaintiff does not plan to introduce evidence of Officer Bell's personnel

records as described unless the door is opened by the defense. Likewise, plaintiff requests that irrelevant, information unknown, prejudicial information and impermissible character evidence pertaining to plaintiff (subject to plaintiff's motions) should also be excluded and plaintiff seeks a joint agreement of such between the parties. Thus, plaintiff believes this motion is unnecessary and a stipulation is appropriate, but if filed, plaintiff will oppose to state plaintiff's position on the issues raised.

- 3) Generally, plaintiff plans to provide all of Mr. Clark's opinions, expressed in his report and at deposition, to the jury and does not agree to exclude any of them. The defendant's letter does not provide enough information for plaintiff to fully consider the items defendant wishes to exclude. Nevertheless, plaintiff agrees that both parties' experts should not provide legal conclusions nor make credibility determinations. Without further detail, plaintiff must oppose.
- 4) Plaintiff agrees to bifurcate the amount of punitive damages into phase two with the predicate question asked in phase one. Thus, plaintiff believes this motion is unnecessary and a stipulation is appropriate (agreement will also be reflected in the parties' MCFLs and PPTCO).
- **Plaintiff's MILs:** Please let us know if you will be presenting any or all the information identified in plaintiff's motions; whether you agree to exclude any or all the information identified; whether defendant will be opposing plaintiff's motions; or whether you are free to discuss further if necessary.

**Best Regards,**

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